ASE GRUYE CEIVER'S CUIVERNY



"WESTERN REGION"

December 18, 1997

Mr. Fred Austin, Puget Sound Air Pollution Control Agency 110 Union Street, Suite 500 Seattle, WA. 98101-2038

Re: Notices of Violation No. 36565; 36566; 36567

Dear Mr. Austin:

Regarding the SO2 emissions in the above NOVs which exceeded the 1 hour start up limit of 200 ppmc. The emissions were reported as occurring during the preheat phase of start up and should be exempt under WAC 173-400-107 (4) Excess emissions due to startup or shutdown. As explained in the CEM addendum, an emission can occasionally occur during the preheat phase of start up which is unavoidable since it is impossible to add sorbent to the system to affect control of SO2.

The fact that the revised approval order #5730 and PSD 90-30 Amendment 1 includes a higher SO2 limit for startup conditions does not nullify the terms of WAC 173-400-107. As PSAPCA is also aware, Ash Grove is currently evaluating the preheat phase of start up as part of a proposal (NOC 6708) to modify the appropriate SO2 limits in the permit.

If Ash Grove can provide any information needed, please contact me as needed.

Yours truly,

Gefald J. Brown

Manager Safety and Environment

cc: Henrik Voldback

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No	11339
Cert. Mail No.	23741273500

Form No. 70-119 (Revised 12/95 cbc)

NOTICE OF VIOLATION

36565

Date of Violation: October 2	1997		EIVED	
Name	Responsible Person, Ti			
Ash Grove Cement Co.	Henrik Ve	oldback,	MG	
Location of Violation (Address)	City	Zip	County	
3801 E. Marginal Way So.	Seattle	98134	King	
Mailing Address	City, State	Zip	Phone V	
As above	Scattle, WA	98134	(206) 623-5596	
Section 5.05(e) Section 6.03(a) Section 9.03(a) Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(c) Section 9.15(c) Section 9.16 Section 9.16 Section 9.20 Section	prior to construction/installation iods aggregating more than a ristics/duration so as to be into the use of best available control able control technology. Ioad onto a paved public road ess equipment or control appray equipment in an enclosed working order.	ion/establishment minutes/hour. jurious or interfere technology. dway. paratus. d area with filtered from the	of a source. with enjoyment of life/proper exhaust and vertical stack. Main Stack	
CORRECTIVE der the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you Notice describing the necessary corrective action you have taken or propulations, and take the following necessary corrective action:	u are ordered to submit a wr	itten report withi	in ten (10) days of receipt of ntinuous compliance with the	
	-			
2 Manto				
No state of the				

Received By:

Signing this Notice is not an admission of guilt

AGCS2M001169

Date/Time

LUGEI SOUND AIR POLLUTION CONTROL AGENCY

Registration No. 11339 Cert. Mail No. Z 334352500 110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Date of Violation: October 3	OF VIOLATION	No. 36566
	Responsible Person, Title	R區 <u>CEIV</u> 框D
Ash Grove Cement Co.		DEC 1 7 1997 AGCVV—SEATTLE
Location of Violation (Address)	City	
3801 E. Marginal Way 50.	Seaffle 98134	County
	Seattle 98134 City, State Zip	King Phone
As Above	Scattle, WA. 98134	
REGULATION CONTROL CAUSE OF	OR ALLOW VIOLATIVE	10 7000 3370
Failure to obtain Notice of Construction approval prior Section 9.11(a) Section 9.12(b) Section 9.15(a) Section 9.15(c) Section 9.16 Section 9.16 Section 9.16 Section 9.16 Section 9.16 Section 9.17 Section 9.16 Section 9.17 Section 9.17 Section 9.17 Section 9.17 Section 9.18 Emission of fugitive dust without use of best available of beauty and miplement an operation approval prior contaminant in quantities/characteristic miplement an operation of automatic prior contaminant in quantities/characteristic miplement an operation of automatic prior contaminant in quantities/characteristic miplement an operation of automatic prior contaminant in quantities/characteristic miplement an	aintenance plan. or to construction/installation/establishment of a gaggregating more than 3 minutes/hour. cs/duration so as to be injurious or interfere with of best available control technology. control technology. control apaved public roadway. quipment or control apparatus. quipment in an enclosed area with filtered exhausing order. condition No. So consisting of the plant of the	ENCY FOR: a source. th enjoyment of life/property.
CTS ALLEGED TO CONSTITUTE A VIOLATION October	- 1997 CEM Report	<u> </u>
CORRECTIVE ACTI For the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are order Society describing the necessary corrective action you have taken or propose to tak and take the following necessary corrective action:		0) days of receipt of compliance with the
'0-119 (Revised 12/95 cbc) Date/Time (4)	Received By:	AGCS2M001170

Received By:

LUGEL BUUITU AIR LUEEULIUN CUNTRUE AGENC.

Registration No. 11339

Cert. Mail No. 2334253500

Form No. 70-119 (Revised 12/95 cbc)

110 Union Street, Suite 500, Seattle, Washington 98101-2038 206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Mo. 36567

Signing this Notice is not an admission of guilt AGCS2M001171

NOTICE OF VIOLATION

Date of Violation: October 10	, 19_0	17	RECEINED			
Name	Responsible Person, Title		DEC 1 7 1997			
Ash Grove Cement Co.	Henrik Vo	Idbaek,	HGUVV—SEATTLE USI			
Location of Violation (Address)	City	Zip	County			
3801 E. Marginal Way So.	Seattle	98134	King			
Mailing Address	City, State	Zip	Phone			
As Above	Scattle, WA.	98134	(206) 623-5596			
DID UNLAWFULLY CAUSE			ENGY FOR			
REGULATIONOF THE PUGET S Section 5.05(e) Failure to develop and implement an operation and	OUND AIR POLLUTION	N CONTROL AG	ENCY FUR:			
 □ Section 6.03(a) □ Section 9.03(a) □ Section 9.11(a) □ Section 9.11(a) □ Section 9.11(a) □ Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source. Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour. Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property. 						
☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology. ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.						
Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway. Emission of fugitive dust from manufacturing process equipment or control apparatus.						
Section 9.16 Section 9.16 Section 9.20 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack. Failure to operate and maintain equipment in good working order. Failure to meet Order of Approval No. 5730 Condition No. 7						
D Section During Start up of the Kilo S	O chissions	from the	main stack			
are not too exceed 200 ppm corrected to 10% Oz 1 hr. Average.						
□ Section_						
FACTS ALLEGED TO CONSTITUTE A VIOLATION October 1997 CEM Report						
	E E E E					
CORRECTIVE ACTION ORDER						
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:						
Jul of Myter						